

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re:

NORTH SEA BRENT CRUDE OIL FUTURES                      1:13-md-02475 (ALC)  
LITIGATION

This document applies to:

1:13-cv-07443-ALC (Coordinated Case)

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**NOTICE OF MOTION TO DISMISS LANDOWNER PLAINTIFF'S  
SECOND AMENDED CLASS ACTION COMPLAINT BY DEFENDANT  
SHELL INTERNATIONAL TRADING AND SHIPPING COMPANY LIMITED**

PLEASE TAKE NOTICE that, upon the memoranda filed jointly by all Defendants and their Supplemental Memorandum of Law in Support of their Motion to Dismiss the Second Amended Class Action Complaint, Defendant Shell International Trading and Shipping Company Limited ("STASCO") will move this Court before the Honorable Andrew L. Carter, at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, on a date and time to be set by the Court, for an Order dismissing Landowner Plaintiff's Second Amended Class Action Complaint (Case Nos. 1:13-cv-07443) with prejudice as to STASCO for failure to state a claim under Federal Rule of Civil Procedure 12(b)(6) and for lack of personal jurisdiction under Federal Rule of Civil Procedure 12(b)(2).

Dated: May 29, 2015

Respectfully submitted,

/s/ Steven A. Reed

Steven A. Reed

R. Brendan Fee

Dana E. Becker

MORGAN, LEWIS & BOCKIUS LLP

1701 Market Street

Philadelphia, PA 19103-2921

Telephone: (215) 963-5000

Facsimile: (215) 963-5001  
[sreed@morganlewis.com](mailto:sreed@morganlewis.com)  
[bfee@morganlewis.com](mailto:bfee@morganlewis.com)  
[dana.becker@morganlewis.com](mailto:dana.becker@morganlewis.com)

*-and-*

Willard K. Tom  
J. Clayton Everett, Jr.  
MORGAN, LEWIS & BOCKIUS LLP  
1111 Pennsylvania Avenue, NW  
Washington, D.C. 20004  
Telephone: (202) 739-3000  
Facsimile: (202) 739-3001  
[wtom@morganlewis.com](mailto:wtom@morganlewis.com)  
[jeverett@morganlewis.com](mailto:jeverett@morganlewis.com)

*Counsel for Defendant,*  
Shell International Trading and Shipping  
Company Limited

**CERTIFICATE OF SERVICE**

I hereby certify that on May 29, 2015, the foregoing Notice of Motion to Dismiss Landowner Plaintiff's Second Amended Class Action Complaint by Defendant Shell International Trading and Shipping Company Limited was filed electronically with the Court and served electronically on all counsel of record who have entered an appearance through the Court's CM/ECF system.

/s/ R. Brendan Fee  
*Counsel for Defendant,*  
Shell International Trading and Shipping  
Company Limited